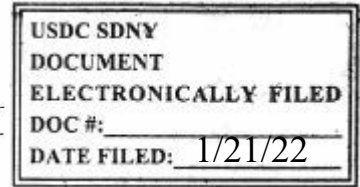


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January 21, 2022

VIA ECF

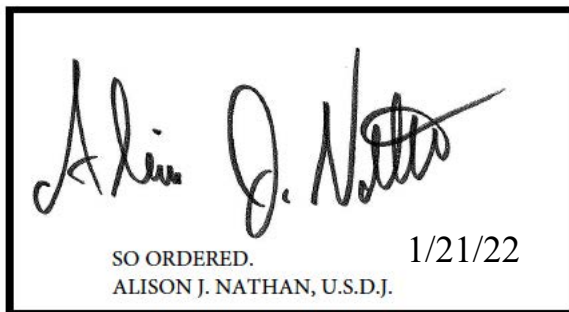
Honorable Alison J. Nathan, U.S.D.J.
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Western Waterproofing Company, Inc. d/b/a Western Specialty
Contractors v. Zurich American Insurance Company, et. al.*
Civil Action No.: 1:20-cv-3199 (AJN) (Related Case: 1:19-cv-6386)

Dear Judge Nathan:

This firm represents Intervenor Starr Indemnity & Liability Company ("Starr"). We respectfully submit this letter on behalf of all parties to this action to request an extension of time to submit a joint letter setting forth the parties' positions and proposed course of action with respect to the proposal set forth in Starr's January 7, 2022 letter (Dkt. 202). The parties participated in meet and confer sessions concerning the proposal on January 14 and January 21. The parties are exchanging information and are scheduled to meet and confer again on January 28. While the parties are cautiously optimistic that progress can be made, we believe it would be beneficial to have additional time to consider the proposal (and any counter-proposals) and continue to meet and confer before providing a joint update to the Court. **Accordingly, the parties respectfully request that the deadline for a joint letter set forth in Your Honor's January 10, 2022 Order (Dkt. 203) be extended to February 7, 2022.**

We thank Your Honor for the time and courtesies extended in this matter.



Respectfully,

JOHN MALONEY

cc: All Counsel of Record (by ECF)